

AO 91 (Rev. 11/11) Criminal Complaint

United States District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

FEB 19 2020

David J. Bradley, Clerk

United States of America

v.

Robert SOTO (Y.O.B. 2000)
Citizenship: United States

Case No.

M-20-0455-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 18, 2020 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

21 USC § 952
21 USC § 841

Offense Description


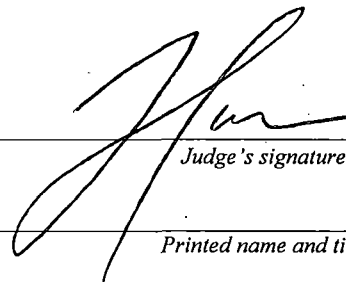
Defendant did knowingly and intentionally possess with the intent to distribute and knowingly and intentionally import into the United States from Mexico approximately 36.74 kilograms of methamphetamine, a schedule II controlled substance

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.Approved by Amy L. Greenbaum
Amy L. Greenbaum 2/19/2020

Sworn to before me and signed in my presence.

Date: 02/18/2020City and state: McAllen, Texas
Complainant's signature
J. Michael Salinas, HSI Special Agent
Printed name and title
Judge's signature
Printed name and title

Attachment "A"

On February 18, 2020, Robert SOTO, a United States Citizen, applied for admission into the United States at the Anzalduas, Texas Port of Entry (POE). SOTO was operating a Ford Mustang and during a primary inspection claimed ownership of the vehicle and advised Customs and Border Protection Officers (CBPOs) that he had been in Mexico for three days and was heading to "City, Texas" for work.

SOTO was referred for a secondary inspection where a CBP K9 alerted to the odor of narcotics emitting from the vehicle. A subsequent x-ray scan of the vehicle revealed anomalies in the vehicle's rear quarter panels. A probe of the rear quarter panels revealed a crystal-like substance which field tested positive for the properties of methamphetamine. A total 119 packages of crystal methamphetamine with a total weight of 36.74 kilograms were extracted from the vehicle.

Homeland Security Investigations Special Agent Joe Michael Salinas responded to the Anzalduas POE for investigative assistance and conducted an interview of SOTO. During the interview, SOTO admitted to knowledge that the vehicle contained methamphetamine. SOTO stated that he was going to be paid \$5,000 in U.S. currency to transport the methamphetamine from Mexico to Houston, Texas.